

EXHIBIT A

SUM-100

**SUMMONS
(CITACION JUDICIAL)**

FOR COURT USE ONLY
(SOLO PARA USO DE LA CORTE)

**NOTICE TO DEFENDANT:
(AVISO AL DEMANDADO):**

TARGET CORPORATION, a Minneapolis corporation;
GENEVIEVE DOE; an individual; and DOES 1 through 50, inclusive,

**YOU ARE BEING SUED BY PLAINTIFF:
(LO ESTÁ DEMANDANDO EL DEMANDANTE):**

ELVIA HERNANDEZ CASTILLO, an individual,

NOTICE! You have been sued. The court may decide against you without your being heard unless you respond within 30 days. Read the information below.

You have 30 CALENDAR DAYS after this summons and legal papers are served on you to file a written response at this court and have a copy served on the plaintiff. A letter or phone call will not protect you. Your written response must be in proper legal form if you want the court to hear your case. There may be a court form that you can use for your response. You can find these court forms and more information at the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), your county law library, or the courthouse nearest you. If you cannot pay the filing fee, ask the court clerk for a fee waiver form. If you do not file your response on time, you may lose the case by default, and your wages, money, and property may be taken without further warning from the court.

There are other legal requirements. You may want to call an attorney right away. If you do not know an attorney, you may want to call an attorney referral service. If you cannot afford an attorney, you may be eligible for free legal services from a nonprofit legal services program. You can locate these nonprofit groups at the California Legal Services Web site (www.lawhelpcalifornia.org), the California Courts Online Self-Help Center (www.courtinfo.ca.gov/selfhelp), or by contacting your local court or county bar association. **NOTE:** The court has a statutory lien for waived fees and costs on any settlement or arbitration award of \$10,000 or more in a civil case. The court's lien must be paid before the court will dismiss the case.

¡AVISO! Lo han demandado. Si no responde dentro de 30 días, la corte puede decidir en su contra sin escuchar su versión. Lea la información a continuación.

Tiene 30 DÍAS DE CALENDARIO después de que le entreguen esta citación y papeles legales para presentar una respuesta por escrito en esta corte y hacer que se entregue una copia al demandante. Una carta o una llamada telefónica no lo protegen. Su respuesta por escrito tiene que estar en formato legal correcto si desea que procesen su caso en la corte. Es posible que haya un formulario que usted pueda usar para su respuesta. Puede encontrar estos formularios de la corte y más información en el Centro de Ayuda de las Cortes de California (www.sucorte.ca.gov), en la biblioteca de leyes de su condado o en la corte que le quede más cerca. Si no puede pagar la cuota de presentación, pida al secretario de la corte que le dé un formulario de exención de pago de cuotas. Si no presenta su respuesta a tiempo, puede perder el caso por incumplimiento y la corte le podrá quitar su sueldo, dinero y bienes sin más advertencia.

Hay otros requisitos legales. Es recomendable que llame a un abogado inmediatamente. Si no conoce a un abogado, puede llamar a un servicio de remisión a abogados. Si no puede pagar a un abogado, es posible que cumpla con los requisitos para obtener servicios legales gratuitos de un programa de servicios legales sin fines de lucro. Puede encontrar estos grupos sin fines de lucro en el sitio web de California Legal Services, (www.lawhelpcalifornia.org), en el Centro de Ayuda de las Cortes de California, (www.sucorte.ca.gov) o poniéndose en contacto con la corte o el colegio de abogados locales. **AVISO:** Por ley, la corte tiene derecho a reclamar las cuotas y los costos exentos por imponer un gravamen sobre cualquier recuperación de \$10,000 ó más de valor recibida mediante un acuerdo o una concesión de arbitraje en un caso de derecho civil. Tiene que pagar el gravamen de la corte antes de que la corte pueda desechar el caso.

The name and address of the court is:
(El nombre y dirección de la corte es):

Los Angeles Superior Court - Central Division
111 North Spring Street, Los Angeles CA 90012

CASE NUMBER:
(Número del Caso):

21STCV08896

The name, address, and telephone number of plaintiff's attorney, or plaintiff without an attorney, is:

(El nombre, la dirección y el número de teléfono del abogado del demandante, o del demandante que no tiene abogado, es):

Maurice S. Newman (SBN 118023)

Sherri R. Carter Executive Officer / Clerk of Court

Tel: 310-777-7877

RAFI & ASSOCIATES, P.C., 9100 Wilshire Blvd., Suite 465E, Beverly Hills, CA 90212

Fax: 310-777-7855

DATE:
(Fecha) 03/05/2021

Clerk, by

(Secretario)

R. Clifton

, Deputy

(Adjunto)

(For proof of service of this summons, use Proof of Service of Summons (form POS-010).)

(Para prueba de entrega de esta citación use el formulario Proof of Service of Summons, (POS-010)).

[SEAL]



NOTICE TO THE PERSON SERVED: You are served

1. ☐ as an individual defendant.

2. ☐ as the person sued under the fictitious name of (specify):

3. ☐ on behalf of (specify):

under: ☐ CCP 416.10 (corporation)

☐ CCP 416.20 (defunct corporation)

☐ CCP 416.40 (association or partnership)

☐ other (specify):

4. ☐ by personal delivery on (date):

☐ CCP 416.60 (minor)

☐ CCP 416.70 (conservatee)

☐ CCP 416.90 (authorized person)

Assigned for all purposes to: Spring Street Courthouse, Judicial Officer: Edward Moreton

1 RAFII & ASSOCIATES, P.C.
MAURICE S. NEWMAN, SBN 118023
2 maurice@rafiilaw.com
9100 Wilshire Boulevard, Suite 465E
3 Beverly Hills, California 90212
Telephone: 310.777.7877
4 Facsimile: 310.777.7855

5 Attorney for Plaintiff

6
7 **SUPERIOR COURT OF THE STATE OF CALIFORNIA**
8 **COUNTY OF LOS ANGELES**

9
10 ELVIA HERNANDEZ CASTILLO, an
individual,

11 Plaintiff,

12 v.

13 TARGET CORPORATION, a Minneapolis
corporation; GENEVIEVE DOE; an
individual; and DOES 1 through 50, inclusive,

14 Defendants.
15
16

Case No. 21STCV08896

**PLAINTIFF'S COMPLAINT FOR
DAMAGES AND PERSONAL INJURIES**

1. NEGLIGENCE;
2. PREMISES LIABILITY

DEMAND FOR JURY TRIAL

17
18 Plaintiff ELVIA HERNANDEZ CASTILLO, an individual (hereinafter "Plaintiff") alleges
19 as follows:

20 **GENERAL ALLEGATIONS**

21 1. Defendant TARGET CORPORATION, (hereinafter "TARGET") is, and at all
22 times mentioned herein, a corporation created under the laws of the state of Minneapolis, doing
23 business in Los Angeles County, California.

24 2. At all times herein mentioned Defendant GENEVIEVE DOE (hereinafter
25 "GENEIEVE") is a natural person who is, and at all times herein mentioned was, a resident of
26 Los Angeles County, California.

27 3. Defendants TARGET, GENEIEVE, and DOES 1 through 50 may be collectively
28 referred to as "Defendants."





1 4. Plaintiff does not know the true names of Defendants DOES 1 through 50 and
2 therefore sues them by those fictitious names. Plaintiff will amend this Complaint to allege their
3 true names and capacities when ascertained. Plaintiff is informed and believes and thereon
4 alleges that each of those Defendants were in some manner negligently and proximately
5 responsible for the events and happenings alleged in this Complaint and for Plaintiff's injuries
6 and damages.

7 5. Plaintiff is informed and believes and thereon alleges that at all times mentioned
8 in this Complaint, each of the Defendants was the agent, alter-ego, joint venture, and/or
9 employee of each of the remaining Defendants, was acting at all times within the course and
10 scope of said agency and employment and with the knowledge and consent of the remaining
11 defendants, and/or was responsible for negligently hiring each of the remaining defendants.
12 Plaintiff is further informed and believes that at all times mentioned herein, each of the
13 Defendants was acting with the knowledge, direction, participation, acquiescence, ratification,
14 and/or consent of the remaining Defendants, and each of them.

15 6. The acts or occurrences giving rise to this action occurred on June 27, 2020, in
16 the City of Rosemead, Los Angeles County, California.

17 7. At all times mentioned in this Complaint, Defendants, and each of them, owned,
18 leased, rented, occupied, possessed, designed, constructed, developed, landscaped, operated,
19 inspected, repaired, maintained, modified, managed, controlled and/or supervised a Target
20 located at 3600 Rosemead Blvd, Rosemead, CA 91770 (hereinafter referred to as the "Subject
21 Premises").

22 8. As a result of the acts and/or omissions of the Defendants, and each of them, as
23 hereinafter alleged, Plaintiff was caused to fall due to condition that was allowed to remain on
24 the floor at or near the entrance of the Subject Premises, thereby causing Plaintiff to sustain the
25 injuries and damages complained of herein.

26 9. Plaintiff is informed and believes that at all times mentioned herein, Defendants,
27 and each of them, owned, maintained, controlled, managed, operated, leased, rented, occupied,
28



1 possessed, designed, constructed, developed, landscaped, inspected, repaired, modified,
2 supervised, permitted, and/or were employed at the Subject Premises.

3 10. At all times mentioned herein, Defendants, and each of them, owed a duty to
4 Plaintiff to keep the subject premises in a safe condition by, inter alia, providing a warning
5 regarding the dangerous condition, or guarding against, preventing, curing, or removing the
6 dangerous condition.

7 11. At all times mentioned herein, Plaintiff was lawfully on the Subject Premises and
8 was unable to foresee or prevent the impending injury.

9 **FIRST CAUSE OF ACTION**

10 **(NEGLIGENCE BY PLAINTIFF AGAINST ALL DEFENDANTS)**

11 12. Plaintiff incorporates each allegation set forth in paragraphs 1 through 11.

12 13. Plaintiff is informed and believes and thereon alleges that on June 27, 2020,
13 Defendants, and each of them, owed a duty of care to Plaintiff to keep the Subject Premises in a
14 safe condition by, inter alia, providing a warning regarding the dangerous condition or guarding
15 against, preventing, curing, or removing the dangerous condition.

16 14. Plaintiff is informed and believes and thereon alleges, that on or about the above-
17 referenced date and place, Defendants, and each of them, owed a duty to Plaintiff because they
18 owned, leased, rented, occupied, possessed, designed, constructed, developed, landscaped,
19 operated, inspected, repaired, maintained, modified, managed, controlled, and/or supervised, the
20 subject premises, permitted or created the dangerous condition, and/or were employed at the
21 Subject Premises.

22 15. Plaintiff is informed and believes and thereon alleges that Defendants, and each
23 of them, breached the aforementioned duty of the care when they negligently and carelessly
24 owned, leased, rented, occupied, possessed, designed, constructed, developed, landscaped,
25 operated, inspected, repaired, maintained, modified, managed, controlled and/or supervised the
26 subject premises; permitted or created the dangerous condition, increased the risk of harm, or
27 created a false sense of safety at the Subject Premises so as to cause Plaintiff to encounter a
28



1 dangerous and deceptive condition causing her to fall, and thereby directly causing the injuries
2 and damages to Plaintiff as described herein.

3 16. As a direct and proximate result of the acts and omissions of Defendants, and
4 each of them, Plaintiff was injured in her health, strength, and activity, sustaining injuries to her
5 body and person, all of which said injuries have caused and continue to cause Plaintiff great
6 physical and mental pain and suffering. Plaintiff is informed and believes and thereon alleges
7 that these injuries will result in some permanent disability to her, all to her general damage in
8 an amount which will be stated according to proof at trial.

9 17. As a further proximate result of the negligence of Defendants, Plaintiff has
10 incurred, and will continue to incur, medical and related expenses in an amount which will be
11 stated according to proof at trial.

12 18. As a further proximate result of the negligence of Defendants as alleged herein,
13 Plaintiff has incurred, and will incur, loss of income, wages, property damage, and other
14 pecuniary losses, the full nature, extent, and amount of which are not yet known to Plaintiff, and
15 the exact number of such expenses will be stated according to proof at the time of trial.

16 **SECOND CAUSE OF ACTION**

17 **(PREMISES LIABILITY BY PLAINTIFF AGAINST ALL DEFENDANTS)**

18 19. Plaintiff incorporates each allegation set forth in Paragraphs 1 through 18,
19 inclusive.

20 20. At all times herein mentioned, Defendants owned, leased, rented, occupied,
21 possessed, designed, constructed, developed, landscaped, operated, inspected, repaired,
22 maintained, modified, managed, controlled and/or supervised the Subject Premises, and/or
23 permitted or created the dangerous condition the Subject Premises so as to cause or allow
24 dangerous and/or defective conditions thereon, and that at all times mentioned herein, the
25 condition of said premises were such that individuals upon the subject premises, including the
26 Plaintiff, were exposed to danger and injury while lawfully on the Subject Premises. Defendants,
27 and each of them, failed to warn Plaintiff of the dangerous condition that existed at the Subject
28



Premises.

21. At all times herein mentioned, Defendants created, knew of, or in the exercise of reasonable care should have known of, the dangerous and defective condition, but failed to take reasonable care to guard against, or warn against, the presence of said condition to prevent injuries to reasonably foreseeable plaintiffs, and/or persons lawfully on the Subject Premises, including Plaintiff.

22. On or about the above-referenced date and place, Defendants, and each of them, negligently and carelessly owned, leased, rented, occupied, possessed, designed, constructed, developed, landscaped, operated, inspected, repaired, maintained, modified, managed, controlled, and/or supervised the Subject Premises so as to cause Plaintiff to fall, and thereby directly and proximately causing the injuries and damages to Plaintiff as described herein.

23. As a direct and proximate result of the conduct of Defendants, and each of them, Plaintiff was injured and injured in her health, strength, and activity, sustaining injuries to her body and person, all of which said injuries have caused and continue to cause Plaintiff great physical and mental pain and suffering. Plaintiff is informed and believes and thereon alleges that these injuries will result in some permanent disability to her, all to her general damage in an amount which will be stated according to proof at trial.

24. As a further direct and proximate result of the negligence of Defendants, Plaintiff has incurred, and will continue to incur, medical and related expenses in an amount according to proof.

25. As a further proximate result of the negligence of Defendants as alleged herein, Plaintiff has incurred, and will incur, loss of income, wages, property damage, and other pecuniary losses, the full nature, extent, and amount of which are not yet known to Plaintiff, and the exact number of such expenses will be stated according to proof at the time of trial.

///

PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for judgment against the Defendants, and each of them, as

1 follows:

- 2 (1) For economic damages, including lost wages, lost employee benefits, medical
3 expenses and other economic obligations incurred according to proof at trial;
4 (2) For non-economic damages, including physical pain and suffering, loss of enjoyment
5 of life and anxiety associated with their injuries;
6 (3) For pre-judgment interest at the maximum legal rate;
7 (4) For post-judgment interest at the maximum legal rate;
8 (5) For costs of suit herein incurred;
9 (6) For such other relief that at the Court may deem just and proper.

10 **DEMAND FOR JURY TRIAL**

11 Plaintiff requests that the present matter be set for jury trial.

12
13 DATED: March 5, 2021

Respectfully submitted,

14 **RAFII & ASSOCIATES, P.C.**

15
16
17 By: 

18 MAURICE S. NEWMAN, ESQ.
19 Attorney for Plaintiff



CM-010

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address): Maurice S. Newman (SBN 118023) RAFII & ASSOCIATES, P.C. 9100 Wilshire Blvd., Suite 465E Beverly Hills, CA 90212 TELEPHONE NO.: 310-777-7877 FAX NO.: 310-777-7855 ATTORNEY FOR (Name): Plaintiff ELVIA HERNANDEZ CASTILLO		FOR COURT USE ONLY	
SUPERIOR COURT OF CALIFORNIA, COUNTY OF Los Angeles STREET ADDRESS: 111 North Spring Street MAILING ADDRESS: Same CITY AND ZIP CODE: Los Angeles 90012 BRANCH NAME: Central Division		CASE NUMBER: <div style="font-size: 1.2em; font-weight: bold;">21STCV08896</div> JUDGE: DEPT:	
CASE NAME: ELVIA HERNANDEZ CASTILLO v. TARGET CORPORATION, et al			
CIVIL CASE COVER SHEET <input checked="" type="checkbox"/> Unlimited (Amount demanded exceeds \$25,000) <input type="checkbox"/> Limited (Amount demanded is \$25,000 or less)		Complex Case Designation <input type="checkbox"/> Counter <input type="checkbox"/> Joinder Filed with first appearance by defendant (Cal. Rules of Court, rule 3.402)	

Items 1–6 below must be completed (see instructions on page 2).

1. Check **one** box below for the case type that best describes this case:

Auto Tort <input type="checkbox"/> Auto (22) <input type="checkbox"/> Uninsured motorist (46) Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort <input type="checkbox"/> Asbestos (04) <input type="checkbox"/> Product liability (24) <input type="checkbox"/> Medical malpractice (45) <input checked="" type="checkbox"/> Other PI/PD/WD (23) Non-PI/PD/WD (Other) Tort <input type="checkbox"/> Business tort/unfair business practice (07) <input type="checkbox"/> Civil rights (08) <input type="checkbox"/> Defamation (13) <input type="checkbox"/> Fraud (16) <input type="checkbox"/> Intellectual property (19) <input type="checkbox"/> Professional negligence (25) <input type="checkbox"/> Other non-PI/PD/WD tort (35) Employment <input type="checkbox"/> Wrongful termination (36) <input type="checkbox"/> Other employment (15)	Contract <input type="checkbox"/> Breach of contract/warranty (06) <input type="checkbox"/> Rule 3.740 collections (09) <input type="checkbox"/> Other collections (09) <input type="checkbox"/> Insurance coverage (18) <input type="checkbox"/> Other contract (37) Real Property <input type="checkbox"/> Eminent domain/Inverse condemnation (14) <input type="checkbox"/> Wrongful eviction (33) <input type="checkbox"/> Other real property (26) Unlawful Detainer <input type="checkbox"/> Commercial (31) <input type="checkbox"/> Residential (32) <input type="checkbox"/> Drugs (38) Judicial Review <input type="checkbox"/> Asset forfeiture (05) <input type="checkbox"/> Petition re: arbitration award (11) <input type="checkbox"/> Writ of mandate (02) <input type="checkbox"/> Other judicial review (39)	Provisionally Complex Civil Litigation (Cal. Rules of Court, rules 3.400–3.403) <input type="checkbox"/> Antitrust/Trade regulation (03) <input type="checkbox"/> Construction defect (10) <input type="checkbox"/> Mass tort (40) <input type="checkbox"/> Securities litigation (28) <input type="checkbox"/> Environmental/Toxic tort (30) <input type="checkbox"/> Insurance coverage claims arising from the above listed provisionally complex case types (41) Enforcement of Judgment <input type="checkbox"/> Enforcement of judgment (20) Miscellaneous Civil Complaint <input type="checkbox"/> RICO (27) <input type="checkbox"/> Other complaint (<i>not specified above</i>) (42) Miscellaneous Civil Petition <input type="checkbox"/> Partnership and corporate governance (21) <input type="checkbox"/> Other petition (<i>not specified above</i>) (43)
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2. This case ☐ is ☒ is not complex under rule 3.400 of the California Rules of Court. If the case is complex, mark the factors requiring exceptional judicial management:

a. <input type="checkbox"/> Large number of separately represented parties b. <input type="checkbox"/> Extensive motion practice raising difficult or novel issues that will be time-consuming to resolve c. <input type="checkbox"/> Substantial amount of documentary evidence	d. <input type="checkbox"/> Large number of witnesses e. <input type="checkbox"/> Coordination with related actions pending in one or more courts in other counties, states, or countries, or in a federal court f. <input type="checkbox"/> Substantial postjudgment judicial supervision
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3. Remedies sought (*check all that apply*): a. ☒ monetary b. ☐ nonmonetary; declaratory or injunctive relief c. ☐ punitive

4. Number of causes of action (*specify*): 2

5. This case ☐ is ☒ is not a class action suit.

6. If there are any known related cases, file and serve a notice of related case. (You may use form CM-015.)

Date: March 5, 2021

Maurice S. Newman, Esq.

(TYPE OR PRINT NAME)


 (SIGNATURE OF PARTY OR ATTORNEY FOR PARTY)

NOTICE

- Plaintiff must file this cover sheet with the first paper filed in the action or proceeding (except small claims cases or cases filed under the Probate Code, Family Code, or Welfare and Institutions Code). (Cal. Rules of Court, rule 3.220.) Failure to file may result in sanctions.
- File this cover sheet in addition to any cover sheet required by local court rule.
- If this case is complex under rule 3.400 et seq. of the California Rules of Court, you must serve a copy of this cover sheet on **all** other parties to the action or proceeding.
- Unless this is a collections case under rule 3.740 or a complex case, this cover sheet will be used for statistical purposes only.

Page 1 of 2

INSTRUCTIONS ON HOW TO COMPLETE THE COVER SHEET

To Plaintiffs and Others Filing First Papers. If you are filing a first paper (for example, a complaint) in a civil case, you **must** complete and file, along with your first paper, the *Civil Case Cover Sheet* contained on page 1. This information will be used to compile statistics about the types and numbers of cases filed. You must complete items 1 through 6 on the sheet. In item 1, you must check **one** box for the case type that best describes the case. If the case fits both a general and a more specific type of case listed in item 1, check the more specific one. If the case has multiple causes of action, check the box that best indicates the **primary** cause of action. To assist you in completing the sheet, examples of the cases that belong under each case type in item 1 are provided below. A cover sheet must be filed only with your initial paper. Failure to file a cover sheet with the first paper filed in a civil case may subject a party, its counsel, or both to sanctions under rules 2.30 and 3.220 of the California Rules of Court.

To Parties in Rule 3.740 Collections Cases. A "collections case" under rule 3.740 is defined as an action for recovery of money owed in a sum stated to be certain that is not more than \$25,000, exclusive of interest and attorney's fees, arising from a transaction in which property, services, or money was acquired on credit. A collections case does not include an action seeking the following: (1) tort damages, (2) punitive damages, (3) recovery of real property, (4) recovery of personal property, or (5) a prejudgment writ of attachment. The identification of a case as a rule 3.740 collections case on this form means that it will be exempt from the general time-for-service requirements and case management rules, unless a defendant files a responsive pleading. A rule 3.740 collections case will be subject to the requirements for service and obtaining a judgment in rule 3.740.

To Parties in Complex Cases. In complex cases only, parties must also use the *Civil Case Cover Sheet* to designate whether the case is complex. If a plaintiff believes the case is complex under rule 3.400 of the California Rules of Court, this must be indicated by completing the appropriate boxes in items 1 and 2. If a plaintiff designates a case as complex, the cover sheet must be served with the complaint on all parties to the action. A defendant may file and serve no later than the time of its first appearance a joinder in the plaintiff's designation, a counter-designation that the case is not complex, or, if the plaintiff has made no designation, a designation that the case is complex.

CASE TYPES AND EXAMPLES

Auto Tort

Auto (22)—Personal Injury/Property Damage/Wrongful Death
Uninsured Motorist (46) (*if the case involves an uninsured motorist claim subject to arbitration, check this item instead of Auto*)

Other PI/PD/WD (Personal Injury/Property Damage/Wrongful Death) Tort

Asbestos (04)
Asbestos Property Damage
Asbestos Personal Injury/Wrongful Death
Product Liability (*not asbestos or toxic/environmental*) (24)
Medical Malpractice (45)
Medical Malpractice—Physicians & Surgeons
Other Professional Health Care Malpractice
Other PI/PD/WD (23)
Premises Liability (e.g., slip and fall)
Intentional Bodily Injury/PD/WD (e.g., assault, vandalism)
Intentional Infliction of Emotional Distress
Negligent Infliction of Emotional Distress
Other PI/PD/WD

Non-PI/PD/WD (Other) Tort

Business Tort/Unfair Business Practice (07)
Civil Rights (e.g., discrimination, false arrest) (*not civil harassment*) (08)
Defamation (e.g., slander, libel) (13)
Fraud (16)
Intellectual Property (19)
Professional Negligence (25)
Legal Malpractice
Other Professional Malpractice (*not medical or legal*)
Other Non-PI/PD/WD Tort (35)

Employment

Wrongful Termination (36)
Other Employment (15)

Contract

Breach of Contract/Warranty (06)
Breach of Rental/Lease
Contract (*not unlawful detainer or wrongful eviction*)
Contract/Warranty Breach—Seller Plaintiff (*not fraud or negligence*)
Negligent Breach of Contract/Warranty
Other Breach of Contract/Warranty
Collections (e.g., money owed, open book accounts) (09)
Collection Case—Seller Plaintiff
Other Promissory Note/Collections Case
Insurance Coverage (*not provisionally complex*) (18)
Auto Subrogation
Other Coverage
Other Contract (37)
Contractual Fraud
Other Contract Dispute

Real Property

Eminent Domain/Inverse Condemnation (14)
Wrongful Eviction (33)
Other Real Property (e.g., quiet title) (26)
Writ of Possession of Real Property
Mortgage Foreclosure
Quiet Title
Other Real Property (*not eminent domain, landlord/tenant, or foreclosure*)

Unlawful Detainer

Commercial (31)
Residential (32)
Drugs (38) (*if the case involves illegal drugs, check this item; otherwise, report as Commercial or Residential*)

Judicial Review

Asset Forfeiture (05)
Petition Re: Arbitration Award (11)
Writ of Mandate (02)
Writ—Administrative Mandamus
Writ—Mandamus on Limited Court Case Matter
Writ—Other Limited Court Case Review
Other Judicial Review (39)
Review of Health Officer Order
Notice of Appeal—Labor
Commissioner Appeals

Provisionally Complex Civil Litigation (Cal. Rules of Court Rules 3.400–3.403)

Antitrust/Trade Regulation (03)
Construction Defect (10)
Claims Involving Mass Tort (40)
Securities Litigation (28)
Environmental/Toxic Tort (30)
Insurance Coverage Claims (*arising from provisionally complex case type listed above*) (41)

Enforcement of Judgment

Enforcement of Judgment (20)
Abstract of Judgment (Out of County)
Confession of Judgment (*non-domestic relations*)
Sister State Judgment
Administrative Agency Award (*not unpaid taxes*)
Petition/Certification of Entry of Judgment on Unpaid Taxes
Other Enforcement of Judgment Case

Miscellaneous Civil Complaint

RICO (27)
Other Complaint (*not specified above*) (42)
Declaratory Relief Only
Injunctive Relief Only (*non-harassment*)
Mechanics Lien
Other Commercial Complaint Case (*non-tort/non-complex*)
Other Civil Complaint (*non-tort/non-complex*)

Miscellaneous Civil Petition

Partnership and Corporate Governance (21)
Other Petition (*not specified above*) (43)
Civil Harassment
Workplace Violence
Elder/Dependent Adult Abuse
Election Contest
Petition for Name Change
Petition for Relief From Late Claim
Other Civil Petition

SHORT TITLE: ELVIA HERNANDEZ CASTILLO v. TARGET CORPORATION, et	CASE NUMBER
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**CIVIL CASE COVER SHEET ADDENDUM AND
STATEMENT OF LOCATION
(CERTIFICATE OF GROUNDS FOR ASSIGNMENT TO COURTHOUSE LOCATION)**

This form is required pursuant to Local Rule 2.3 in all new civil case filings in the Los Angeles Superior Court.

Step 1: After completing the Civil Case Cover Sheet (Judicial Council form CM-010), find the exact case type in Column A that corresponds to the case type indicated in the Civil Case Cover Sheet.

Step 2: In Column B, check the box for the type of action that best describes the nature of the case.

Step 3: In Column C, circle the number which explains the reason for the court filing location you have chosen.

Applicable Reasons for Choosing Court Filing Location (Column C)

- | | |
|--|---|
| 1. Class actions must be filed in the Stanley Mosk Courthouse, Central District.
2. Permissive filing in central district.
3. Location where cause of action arose.
4. Mandatory personal injury filing in North District.
5. Location where performance required or defendant resides.
6. Location of property or permanently garaged vehicle. | 7. Location where petitioner resides.
8. Location wherein defendant/respondent functions wholly.
9. Location where one or more of the parties reside.
10. Location of Labor Commissioner Office.
11. Mandatory filing location (Hub Cases – unlawful detainer, limited non-collection, limited collection, or personal injury). |
|--|---|

	A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Auto Tort	Auto (22)	<input type="checkbox"/> A7100 Motor Vehicle - Personal Injury/Property Damage/Wrongful Death	1, 4, 11
	Uninsured Motorist (46)	<input type="checkbox"/> A7110 Personal Injury/Property Damage/Wrongful Death – Uninsured Motorist	1, 4, 11
Other Personal Injury/Property Damage/Wrongful Death Tort	Asbestos (04)	<input type="checkbox"/> A6070 Asbestos Property Damage <input type="checkbox"/> A7221 Asbestos - Personal Injury/Wrongful Death	1, 11 1, 11
	Product Liability (24)	<input type="checkbox"/> A7260 Product Liability (not asbestos or toxic/environmental)	1, 4, 11
	Medical Malpractice (45)	<input type="checkbox"/> A7210 Medical Malpractice - Physicians & Surgeons	1, 4, 11
		<input type="checkbox"/> A7240 Other Professional Health Care Malpractice	1, 4, 11
	Other Personal Injury Property Damage Wrongful Death (23)	<input type="checkbox"/> A7250 Premises Liability (e.g., slip and fall)	1, 4, 11
		<input type="checkbox"/> A7230 Intentional Bodily Injury/Property Damage/Wrongful Death (e.g., assault, vandalism, etc.)	1, 4, 11
		<input type="checkbox"/> A7270 Intentional Infliction of Emotional Distress	1, 4, 11
		<input checked="" type="checkbox"/> A7220 Other Personal Injury/Property Damage/Wrongful Death	1, 4, 11

SHORT TITLE: ELVIA HERNANDEZ CASTILLO v. TARGET CORPORATION, et		CASE NUMBER
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	A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Non-Personal Injury/ Property Damage/ Wrongful Death Tort	Business Tort (07)	<input type="checkbox"/> A6029 Other Commercial/Business Tort (not fraud/breach of contract)	1, 2, 3
	Civil Rights (08)	<input type="checkbox"/> A6005 Civil Rights/Discrimination	1, 2, 3
	Defamation (13)	<input type="checkbox"/> A6010 Defamation (slander/libel)	1, 2, 3
	Fraud (16)	<input type="checkbox"/> A6013 Fraud (no contract)	1, 2, 3
	Professional Negligence (25)	<input type="checkbox"/> A6017 Legal Malpractice <input type="checkbox"/> A6050 Other Professional Malpractice (not medical or legal)	1, 2, 3 1, 2, 3
	Other (35)	<input type="checkbox"/> A6025 Other Non-Personal Injury/Property Damage tort	1, 2, 3
Employment	Wrongful Termination (36)	<input type="checkbox"/> A6037 Wrongful Termination	1, 2, 3
	Other Employment (15)	<input type="checkbox"/> A6024 Other Employment Complaint Case <input type="checkbox"/> A6109 Labor Commissioner Appeals	1, 2, 3 10
Contract	Breach of Contract/ Warranty (06) (not insurance)	<input type="checkbox"/> A6004 Breach of Rental/Lease Contract (not unlawful detainer or wrongful eviction) <input type="checkbox"/> A6008 Contract/Warranty Breach -Seller Plaintiff (no fraud/negligence) <input type="checkbox"/> A6019 Negligent Breach of Contract/Warranty (no fraud) <input type="checkbox"/> A6028 Other Breach of Contract/Warranty (not fraud or negligence)	2, 5 2, 5 1, 2, 5 1, 2, 5
	Collections (09)	<input type="checkbox"/> A6002 Collections Case-Seller Plaintiff <input type="checkbox"/> A6012 Other Promissory Note/Collections Case <input type="checkbox"/> A6034 Collections Case-Purchased Debt (Charged Off Consumer Debt Purchased on or after January 1, 2014)	5, 6, 11 5, 11 5, 6, 11
	Insurance Coverage (18)	<input type="checkbox"/> A6015 Insurance Coverage (not complex)	1, 2, 5, 8
	Other Contract (37)	<input type="checkbox"/> A6009 Contractual Fraud <input type="checkbox"/> A6031 Tortious Interference <input type="checkbox"/> A6027 Other Contract Dispute(not breach/insurance/fraud/negligence)	1, 2, 3, 5 1, 2, 3, 5 1, 2, 3, 8, 9
	Eminent Domain/Inverse Condemnation (14)	<input type="checkbox"/> A7300 Eminent Domain/Condemnation Number of parcels _____	2, 6
Real Property	Wrongful Eviction (33)	<input type="checkbox"/> A6023 Wrongful Eviction Case	2, 6
	Other Real Property (26)	<input type="checkbox"/> A6018 Mortgage Foreclosure <input type="checkbox"/> A6032 Quiet Title <input type="checkbox"/> A6060 Other Real Property (not eminent domain, landlord/tenant, foreclosure)	2, 6 2, 6 2, 6
	Unlawful Detainer-Commercial (31)	<input type="checkbox"/> A6021 Unlawful Detainer-Commercial (not drugs or wrongful eviction)	6, 11
Unlawful Detainer	Unlawful Detainer-Residential (32)	<input type="checkbox"/> A6020 Unlawful Detainer-Residential (not drugs or wrongful eviction)	6, 11
	Unlawful Detainer- Post-Foreclosure (34)	<input type="checkbox"/> A6020F Unlawful Detainer-Post-Foreclosure	2, 6, 11
	Unlawful Detainer-Drugs (38)	<input type="checkbox"/> A6022 Unlawful Detainer-Drugs	2, 6, 11

SHORT TITLE: ELVIA HERNANDEZ CASTILLO v. TARGET CORPORATION, et	CASE NUMBER
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	A Civil Case Cover Sheet Category No.	B Type of Action (Check only one)	C Applicable Reasons - See Step 3 Above
Judicial Review	Asset Forfeiture (05)	<input type="checkbox"/> A6108 Asset Forfeiture Case	2, 3, 6
	Petition re Arbitration (11)	<input type="checkbox"/> A6115 Petition to Compel/Confirm/Vacate Arbitration	2, 5
	Writ of Mandate (02)	<input type="checkbox"/> A6151 Writ - Administrative Mandamus <input type="checkbox"/> A6152 Writ - Mandamus on Limited Court Case Matter <input type="checkbox"/> A6153 Writ - Other Limited Court Case Review	2, 8 2 2
	Other Judicial Review (39)	<input type="checkbox"/> A6150 Other Writ /Judicial Review	2, 8
Provisionally Complex Litigation	Antitrust/Trade Regulation (03)	<input type="checkbox"/> A6003 Antitrust/Trade Regulation	1, 2, 8
	Construction Defect (10)	<input type="checkbox"/> A6007 Construction Defect	1, 2, 3
	Claims Involving Mass Tort (40)	<input type="checkbox"/> A6006 Claims Involving Mass Tort	1, 2, 8
	Securities Litigation (28)	<input type="checkbox"/> A6035 Securities Litigation Case	1, 2, 8
	Toxic Tort Environmental (30)	<input type="checkbox"/> A6036 Toxic Tort/Environmental	1, 2, 3, 8
	Insurance Coverage Claims from Complex Case (41)	<input type="checkbox"/> A6014 Insurance Coverage/Subrogation (complex case only)	1, 2, 5, 8
Enforcement of Judgment	Enforcement of Judgment (20)	<input type="checkbox"/> A6141 Sister State Judgment <input type="checkbox"/> A6160 Abstract of Judgment <input type="checkbox"/> A6107 Confession of Judgment (non-domestic relations) <input type="checkbox"/> A6140 Administrative Agency Award (not unpaid taxes) <input type="checkbox"/> A6114 Petition/Certificate for Entry of Judgment on Unpaid Tax <input type="checkbox"/> A6112 Other Enforcement of Judgment Case	2, 5, 11 2, 6 2, 9 2, 8 2, 8 2, 8, 9
	RICO (27)	<input type="checkbox"/> A6033 Racketeering (RICO) Case	1, 2, 8
	Other Complaints (Not Specified Above) (42)	<input type="checkbox"/> A6030 Declaratory Relief Only <input type="checkbox"/> A6040 Injunctive Relief Only (not domestic/harassment) <input type="checkbox"/> A6011 Other Commercial Complaint Case (non-tort/non-complex) <input type="checkbox"/> A6000 Other Civil Complaint (non-tort/non-complex)	1, 2, 8 2, 8 1, 2, 8 1, 2, 8
	Partnership Corporation Governance (21)	<input type="checkbox"/> A6113 Partnership and Corporate Governance Case	2, 8
	Other Petitions (Not Specified Above) (43)	<input type="checkbox"/> A6121 Civil Harassment <input type="checkbox"/> A6123 Workplace Harassment <input type="checkbox"/> A6124 Elder/Dependent Adult Abuse Case <input type="checkbox"/> A6190 Election Contest <input type="checkbox"/> A6110 Petition for Change of Name/Change of Gender <input type="checkbox"/> A6170 Petition for Relief from Late Claim Law <input type="checkbox"/> A6100 Other Civil Petition	2, 3, 9 2, 3, 9 2, 3, 9 2 2, 7 2, 3, 8 2, 9

SHORT TITLE: ELVIA HERNANDEZ CASTILLO v. TARGET CORPORATION, et	CASE NUMBER
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Step 4: Statement of Reason and Address: Check the appropriate boxes for the numbers shown under Column C for the type of action that you have selected. Enter the address which is the basis for the filing location, including zip code. (No address required for class action cases).

REASON: <input type="checkbox"/> 1. <input type="checkbox"/> 2. <input type="checkbox"/> 3. <input type="checkbox"/> 4. <input type="checkbox"/> 5. <input type="checkbox"/> 6. <input type="checkbox"/> 7. <input type="checkbox"/> 8. <input type="checkbox"/> 9. <input type="checkbox"/> 10. <input checked="" type="checkbox"/> 11.			ADDRESS: 3600 Rosemead Blvd, Rosemead, CA 91770
CITY: Rosemead	STATE: CA	ZIP CODE: 91770	

Step 5: Certification of Assignment: I certify that this case is properly filed in the CENTRAL District of the Superior Court of California, County of Los Angeles [Code Civ. Proc., §392 et seq., and Local Rule 2.3(a)(1)(E)].

Dated: March 5, 2021

(SIGNATURE OF ATTORNEY/FILING PARTY)

PLEASE HAVE THE FOLLOWING ITEMS COMPLETED AND READY TO BE FILED IN ORDER TO PROPERLY COMMENCE YOUR NEW COURT CASE:

1. Original Complaint or Petition.
2. If filing a Complaint, a completed Summons form for issuance by the Clerk.
3. Civil Case Cover Sheet, Judicial Council form CM-010.
4. Civil Case Cover Sheet Addendum and Statement of Location form, LACIV 109, LASC Approved 03-04 (Rev. 02/16).
5. Payment in full of the filing fee, unless there is court order for waiver, partial or scheduled payments.
6. A signed order appointing the Guardian ad Litem, Judicial Council form CIV-010, if the plaintiff or petitioner is a minor under 18 years of age will be required by Court in order to issue a summons.
7. Additional copies of documents to be conformed by the Clerk. Copies of the cover sheet and this addendum must be served along with the summons and complaint, or other initiating pleading in the case.

SUPERIOR COURT OF CALIFORNIA COUNTY OF LOS ANGELES		<small>Reserved for Clerk's File Stamp</small> FILED Superior Court of California County of Los Angeles 03/05/2021 Sherri R. Carter, Executive Officer / Clerk of Court By: <u> R. Clifton </u> Deputy
COURTHOUSE ADDRESS: Spring Street Courthouse 312 North Spring Street, Los Angeles, CA 90012		
NOTICE OF CASE ASSIGNMENT UNLIMITED CIVIL CASE		
Your case is assigned for all purposes to the judicial officer indicated below.		CASE NUMBER: 21STCV08896

THIS FORM IS TO BE SERVED WITH THE SUMMONS AND COMPLAINT

	ASSIGNED JUDGE	DEPT	ROOM		ASSIGNED JUDGE	DEPT	ROOM
✓	Edward B. Moreton	27					

Given to the Plaintiff/Cross-Complainant/Attorney of Record

Sherri R. Carter, Executive Officer / Clerk of Court

on 03/08/2021
(Date)By R. Clifton, Deputy Clerk

INSTRUCTIONS FOR HANDLING UNLIMITED CIVIL CASES

The following critical provisions of the California Rules of Court, Title 3, Division 7, as applicable in the Superior Court, are summarized for your assistance.

APPLICATION

The Division 7 Rules were effective January 1, 2007. They apply to all general civil cases.

PRIORITY OVER OTHER RULES

The Division 7 Rules shall have priority over all other Local Rules to the extent the others are inconsistent.

CHALLENGE TO ASSIGNED JUDGE

A challenge under Code of Civil Procedure Section 170.6 must be made within **15** days after notice of assignment for all purposes to a judge, or if a party has not yet appeared, within 15 days of the first appearance.

TIME STANDARDS

Cases assigned to the Independent Calendaring Courts will be subject to processing under the following time standards:

COMPLAINTS

All complaints shall be served within 60 days of filing and proof of service shall be filed within 90 days.

CROSS-COMPLAINTS

Without leave of court first being obtained, no cross-complaint may be filed by any party after their answer is filed. Cross-complaints shall be served within 30 days of the filing date and a proof of service filed within 60 days of the filing date.

STATUS CONFERENCE

A status conference will be scheduled by the assigned Independent Calendar Judge no later than 270 days after the filing of the complaint. Counsel must be fully prepared to discuss the following issues: alternative dispute resolution, bifurcation, settlement, trial date, and expert witnesses.

FINAL STATUS CONFERENCE

The Court will require the parties to attend a final status conference not more than 10 days before the scheduled trial date. All parties shall have motions in limine, bifurcation motions, statements of major evidentiary issues, dispositive motions, requested form jury instructions, special jury instructions, and special jury verdicts timely filed and served prior to the conference. These matters may be heard and resolved at this conference. At least five days before this conference, counsel must also have exchanged lists of exhibits and witnesses, and have submitted to the court a brief statement of the case to be read to the jury panel as required by Chapter Three of the Los Angeles Superior Court Rules.

SANCTIONS

The court will impose appropriate sanctions for the failure or refusal to comply with Chapter Three Rules, orders made by the Court, and time standards or deadlines established by the Court or by the Chapter Three Rules. Such sanctions may be on a party, or if appropriate, on counsel for a party.

This is not a complete delineation of the Division 7 or Chapter Three Rules, and adherence only to the above provisions is therefore not a guarantee against the imposition of sanctions under Trial Court Delay Reduction. Careful reading and compliance with the actual Chapter Rules is imperative.

Class Actions

Pursuant to Local Rule 2.3, all class actions shall be filed at the Stanley Mosk Courthouse and are randomly assigned to a complex judge at the designated complex courthouse. If the case is found not to be a class action it will be returned to an Independent Calendar Courtroom for all purposes.

***Provisionally Complex Cases**

Cases filed as provisionally complex are initially assigned to the Supervising Judge of complex litigation for determination of complex status. If the case is deemed to be complex within the meaning of California Rules of Court 3.400 et seq., it will be randomly assigned to a complex judge at the designated complex courthouse. If the case is found not to be complex, it will be returned to an Independent Calendar Courtroom for all purposes.

2018-SJ-007-00

FILED
Superior Court of California
County of Los Angeles

APR 16 2018

Sherri R. Carter, Executive Officer/Clerk
By Stephanie Chung Deputy

SUPERIOR COURT OF THE STATE OF CALIFORNIA
FOR THE COUNTY OF LOS ANGELES

IN RE PERSONAL INJURY) CASE NO.: 21STCV08896
COURT ("PI COURT") PROCEDURES,)
CENTRAL DISTRICT) STANDING ORDER RE: PERSONAL
(EFFECTIVE APRIL 16, 2018)) INJURY PROCEDURES, CENTRAL
) DISTRICT
)
)

DEPARTMENT:2 ☐ 3 ☐ 4 ☐ 5 ☐ 7 ☐**FINAL STATUS CONFERENCE ("FSC"):**

- DATE: 08/19/2022 AT 10:00 A.M.

TRIAL:

- DATE: 09/02/2022 AT 8:30 A.M.

OSC RE DISMISSAL (CODE CIV. PROC., § 583.210):

- DATE: 03/01/2024 AT 8:30 A.M.

TO EACH PARTY AND TO THE ATTORNEY OF RECORD FOR EACH PARTY:

Pursuant to the California Code of Civil Procedure ("C.C.P."), the California Rules of Court ("C.R.C.") and the Los Angeles County Court Rules ("Local Rules"), the Los Angeles Superior Court ("LASC" or "Court") HEREBY AMENDS AND SUPERSEDES THE AUGUST 10, 2017 SEVENTH AMENDED GENERAL ORDER AND, GENERALLY, ORDERS AS FOLLOWS IN THIS AND ALL OTHER GENERAL JURISDICTION PERSONAL INJURY ACTIONS FILED IN THE CENTRAL DISTRICT.

1. To ensure proper assignment to a PI Court, Plaintiff(s) must carefully fill out the Civil Case Cover Sheet Addendum (form LACIV 109). The Court defines "personal injury" as:

"an unlimited civil case described on the Civil Case Cover Sheet Addendum and Statement of Location (LACIV 109) as Motor Vehicle-Personal Injury/Property Damage/Wrongful Death; Personal Injury/Property Damage/Wrongful Death-Uninsured Motorist; Product Liability (other than asbestos or toxic/environmental); Medical Malpractice-Physicians & Surgeons; Other Professional Health Care Malpractice; Premises Liability; Intentional Bodily Injury/Property Damage/Wrongful Death; or Other Personal Injury/Property Damage/Wrongful Death. An action for intentional infliction of emotional distress, defamation, civil rights/discrimination, or malpractice (other than medical malpractice), is not included in this definition. An action for injury to real property is not included in this definition." (Local Rule 2.3(a)(1)(A).)

Consistent with Local Rule 2.3(a)(1)(A), the Court will assign a case to the PI Courts if plaintiff(s) check any of the following boxes in the Civil Case Cover Sheet Addendum:

A7100 Motor Vehicle – Personal Injury/Property Damage/Wrongful Death

A7110 Personal Injury/Property Damage/Wrongful Death – Uninsured Motorist

A7260 Product Liability (not asbestos or toxic/environmental)

A7210 Medical Malpractice – Physicians & Surgeons

A7240 Medical Malpractice – Other Professional Health Care Malpractice

A7250 Premises Liability (e.g., slip and fall)

A7230 Intentional Bodily Injury/Property Damage/Wrongful Death (e.g., assault, vandalism etc.)

A7220 Other Personal Injury/Property Damage/Wrongful Death

The Court will not assign cases to the PI Courts if plaintiff(s) check any boxes elsewhere in the Civil Case Cover Sheet Addendum (any boxes on pages two and three of that form).

///

1 The Court sets the above dates in this action in the PI Court circled above (Department
2 2, 3, 4, 5, or 7) at the Spring Street Courthouse, 312 North Spring Street, Los Angeles, CA 90012.
3 (C.R.C. Rules 3.714(b)(3), 3.729.)

4 **FILING OF DOCUMENTS**

5 2. Parties may file documents in person at the filing window on the first floor of the Stanley
6 Mosk Courthouse (111 N. Hill Street, Los Angeles, CA 90012) or by U.S. Mail or e-Delivery,
7 which is available online at www.lacourt.org (link on homepage). Please note that filings are no
8 longer accepted via facsimile and must be filed either in person, via U.S. mail or via e-Delivery.
9 Claims involving an attorney-client fee dispute, documents in which the filing party is a minor,
10 legally incompetent person, or person for whom a conservator has been appointed, requests to
11 waive court fees (FW-001) and requests for accommodations by persons with disabilities (MC-
12 410), may not be filed via e-Delivery.

13 **SERVICE OF SUMMONS AND COMPLAINT**

14 3. Plaintiff(s) shall serve the summons and complaint in this action upon defendant(s) as
15 soon as possible but no later than three years from the date when the complaint is filed.
16 (C.C.P. § 583.210, subd.(a).) On the OSC re Dismissal date noted above, the PI Court will
17 dismiss the action and/or all unserved parties unless the plaintiff(s) show cause why the action
18 or the unserved parties should not be dismissed. (C.C.P. §§ 583.250; 581, subd. (b)(4).)

19 4. The Court sets the above trial and FSC dates on condition that plaintiff(s) effectuate
20 service on defendant(s) of the summons and complaint within six months of filing the complaint.

21 5. The PI Court will dismiss the case without prejudice pursuant to C.C.P. § 581 when no
22 party appears for trial.

23 **STIPULATIONS TO CONTINUE TRIAL**

24 6. Provided that all parties agree (and there is no violation of the "five-year rule," C.C.P.
25 § 583.310), the parties may advance or continue any trial date in the PI Courts without showing
26 good cause or articulating any reason or justification for the change. To continue or advance a
27 trial date, the parties (or their counsel of record) should jointly execute and submit (at the filing
28 window on the first floor of the Stanley Mosk Courthouse, via U.S. mail or via e-Delivery; fee

1 required) a Stipulation to Continue Trial, FSC and Related Motion/Discovery Dates (form
2 LACIV CTRL-242, available on the court's website, Personal Injury Court link). The PI Courts
3 schedule FSCs for 10:00 a.m., eight (8) court days before the trial date. Parties seeking to
4 continue the trial and FSC dates shall file the Stipulation at least eight court days before the FSC
5 date. Parties seeking to advance the trial and FSC dates shall file the Stipulation at least eight
6 court days before the proposed advanced FSC date. (C.C.P. § 595.2; Govt. Code § 70617, subd.
7 (c)(2).) In selecting a new trial date, parties should avoid setting on any Monday, or the Tuesday
8 following a court holiday. Parties may submit a maximum of two stipulations to continue trial,
9 for a total continuance of six months. Subsequent requests to continue trial will be granted upon
10 a showing of good cause by noticed motion. This rule is retroactive so that any previously
11 granted stipulation to continue trial will count toward the maximum number of allowed
12 continuances.

13 **NO CASE MANAGEMENT CONFERENCES**

14 7. The PI Courts do not conduct Case Management Conferences. The parties need not file
15 a Case Management Statement.

16 **LAW AND MOTION**

17 8. Any documents with declarations and/or exhibits must be tabbed. (C.R.C. Rule
18 3.1110(f).) All depositions excerpts referenced in briefs must be marked on the transcripts
19 attached as exhibits. (C.R.C. Rule 3.1116(c).)

20 **CHAMBERS COPIES REQUIRED**

21 9. In addition to filing original motion papers at the filing window on the first floor of the
22 Stanley Mosk Courthouse, via U.S. mail or via e-Delivery, the parties must deliver, directly to
23 the PI Court courtrooms at the Spring Street Courthouse, an extra copy (marked "Chambers
24 Copy") of reply briefs and all other motion papers filed less than seven (7) court days before a
25 hearing calendared in the PI Courts. The PI Courts also strongly encourage the parties filing and
26 opposing lengthy motions, such as motions for summary judgment/adjudication, to submit one
27 or more three-ring binders organizing the chambers copy behind tabs.

28 ///

RESERVATION HEARING DATE

10. Parties are directed to reserve hearing dates for motions in the PI Courts using the Court Reservation System (CRS) available online at www.lacourt.org (link on homepage). After reserving a motion hearing date, the reservation requestor must submit the papers for filing with the reservation receipt (CRS) number printed on the face page of the document under the caption and attach the reservation receipt as the last page. Parties or counsel who are unable to utilize the online CRS may reserve a motion hearing date by calling the PI Court courtroom, Monday through Friday, between 3:00 p.m. and 4:00 p.m.

WITHDRAWAL OF MOTIONS

11. California Rules of Court, Rule 3.1304(b) requires a moving party to notify the court immediately if a matter will not be heard on the scheduled date. In keeping with that rule, the PI Courts urge parties who amend pleadings in response to demurrers to file amended pleadings before the date when opposition to the demurrer is due so that the PI Courts do not needlessly prepare tentative rulings on demurrers.

DISCOVERY MOTIONS

12. The purpose of an Informal Discovery Conference ("IDC") is to assist the parties to resolve and/or narrow the scope of discovery disputes. Lead trial counsel on each side, or another attorney with full authority to make binding agreements, must attend in person. The PI judges have found that, in nearly every case, the parties amicably resolve disputes with the assistance of the Court.

13. Parties **must** participate in an IDC **before** a Motion to Compel Further Responses to Discovery will be heard unless the moving party submits evidence, by way of declaration, that the opposing party has failed or refused to participate in an IDC. Scheduling or participating in an IDC does not automatically extend any deadlines imposed by the Code of Civil Procedure for noticing and filing discovery motions. Ideally, the parties should participate in an IDC before a motion is filed because the IDC may avoid the necessity of a motion or reduce its scope. Because of that possibility, attorneys are encouraged to stipulate to extend the 45 (or 60) day deadline for filing a motion to compel further discovery responses in order to allow time to participate in an

1 IDC.

2 If parties do not stipulate to extend the deadlines, the moving party may file the motion
3 to avoid it being deemed untimely. However, the IDC must take place before the motion is
4 heard so it is suggested that the moving party reserve a date for the motion hearing that is at least
5 60 days after the date when the IDC reservation is made. Motions to Compel Further Discovery
6 Responses are heard at 10:00 a.m. If the IDC is not productive, the moving party may advance
7 the hearing on a Motion to Compel Further Discovery Responses on any available hearing date
8 that complies with the notice requirements of the Code of Civil Procedure.

9 14. Parties are directed to reserve IDC dates in the PI Courts using CRS available online at
10 www.lacourt.org (link on homepage). Parties are to meet and confer regarding the available
11 dates in CRS prior to accessing the system. After reserving the IDC date, the reservation
12 requestor must file in the appropriate department and serve an Informal Discovery Conference
13 Form for Personal Injury Courts, from LACIV 239 (revised 12/14 or later), at least 15 court days
14 prior to the conference and attach the CRS reservation receipt as the last page. The opposing
15 party may file and serve a responsive IDC form, briefly setting forth that party's response, at
16 least 10 court days prior to the IDC.

17 15. Time permitting, the PI Hub judges may be available to participate in IDCs to try to
18 resolve other types of discovery disputes.

19 **EX PARTE APPLICATIONS**

20 16. Under the California Rules of Court, courts may only grant *ex parte* relief upon a
21 showing, by admissible evidence, that the moving party will suffer "irreparable harm,"
22 "immediate danger," or where the moving party identifies "a statutory basis for granting relief
23 *ex parte*." (C.R.C. Rule 3.1202(c).) The PI Courts have no capacity to hear multiple *ex parte*
24 applications or to shorten time to add hearings to their fully booked motion calendars. The PI
25 Courts do not regard the Court's unavailability for timely motion hearings as an "immediate
26 danger" or threat of "irreparable harm" justifying *ex parte* relief. Instead of seeking *ex parte*
27 relief, the moving party should reserve the earliest available motion hearing date (even if it is
28 after the scheduled trial date) and should file a motion to continue trial. Parties should also check

1 the Court Reservation System from time to time because earlier hearing dates may become
2 available as cases settle or hearings are taken off calendar.

3 **REQUEST FOR TRANSFER TO INDEPENDENT CALENDAR DEPARTMENT**

4 17. Parties seeking to transfer a case from a PI Court to an Independent Calendar (“I/C”) Court shall file (at the filing window on the first floor of the Stanley Mosk Courthouse, via U.S.
5 mail or via e-Delivery) and serve the Court’s “Motion to Transfer Complicated Personal Injury
6 Case to Independent Calendar Court” (form LACIV 238, available on the Court’s website under
7 the PI Courts link). The PI Courts will transfer a matter to an I/C Court if the case is not a
8 “Personal Injury” case as defined in this Order, or if it is “complicated.” In determining whether
9 a personal injury case is “complicated” the PI Courts will consider, among other things, the
10 number of pretrial hearings or the complexity of issues presented.

12 18. Parties opposing a motion to transfer have five court days to file (at the filing window
13 on the first floor of the Stanley Mosk Courthouse, via U.S. mail or via e-Delivery) an Opposition
14 (using the same LACIV 238 Motion to Transfer form).

15 19. The PI Courts will not conduct a hearing on any Motion to Transfer to I/C Court.
16 Although the parties may stipulate to transfer a case to an Independent Calendar Department, the
17 PI Courts will make an independent determination whether to transfer the case or not.

18 **FINAL STATUS CONFERENCE**

19 20. Parties shall comply with the requirements of the PI Courts’ “First Amended Standing
20 Order Re Final Status Conference,” which shall be served with the summons and complaint.

21 **JURY FEES**

22 21. Parties must pay jury fees no later than 365 calendar days after the filing of the initial
23 complaint. (C. C. P. § 631, subds. (b) and (c).)

24 **JURY TRIALS**

25 22. The PI Courts do not conduct jury trials. On the trial date, a PI Court will contact the
26 Master Calendar Court, Department One, in the Stanley Mosk Courthouse. Department One
27 will assign cases out for trial to dedicated Civil Trial Courtrooms and designated Criminal
28 Courtrooms.

SANCTIONS

23. The Court has discretion to impose sanctions for any violation of this general order.
(C.C.P. §§ 128.7, 187 and Gov. Code, § 68608, subd. (b).)

Dated:

April 16, 2018

Debre K. Weintraub

Debre K. Weintraub
Supervising Judge of Civil Courts
Los Angeles Superior Court

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address) Maurice S. Newman, Esq. SBN: 118023 Rafii & Associates 9100 Wilshire Boulevard, Suite 465E Beverly Hills, CA 90212 TELEPHONE NO.: (310) 777-7877 FAX NO. (310) 777-7855 E-MAIL ADDRESS ATTORNEY FOR (Name): Plaintiff: Elvia Hernandez Castillo, an individual,		FOR COURT USE ONLY
Los Angeles County Superior Court - Stanley Mosk Courthouse STREET ADDRESS: 111 North Hill Street MAILING ADDRESS: CITY AND ZIP CODE: Los Angeles, CA 90012 BRANCH NAME: Stanley Mosk Courthouse - Central District		
PLAINTIFF: Elvia Hernandez Castillo, an individual, DEFENDANT: Target Corporation, a Minneapolis corporation; Genevieve Doe; an individual; and Does 1 through 50, inclusive,	CASE NUMBER: 21STCV08896	
PROOF OF SERVICE OF SUMMONS		Ref. No. or File No.:

1. At the time of service I was at least 18 years of age and not a party to this action.
2. I served copies of:
 - a. ☒ Summons
 - b. ☒ Complaint
 - c. ☒ Alternative Dispute Resolution (ADR) package
 - d. ☒ Civil Case Cover Sheet
 - e. ☐ Cross-complaint
 - f. ☒ other (specify documents): **See attached Document List**
3. a. Party served (specify name of party as shown on documents served):
Target Corporation, a Minneapolis corporation
 - b. ☒ Person (other than the party in item 3a) served on behalf of an entity or as an authorized agent (and not a person under item 5b on whom substituted service was made) (specify name and relationship to the party named in item 3a):
C T Corporation System, c/o John Montijo - Registered Agent for Service of Process
Age: 20 Weight: 145 Hair: Brown Sex: Male Height: Eyes: Brown Race: White
4. Address where the party was served: **C T Corporation System**
330 N Brand Blvd Ste 700
Glendale, CA 91203-2336
5. I served the party (check proper box)
 - a. ☒ **by personal service.** I personally delivered the documents listed in item 2 to the party or person authorized to receive service of process for the party (1) on (date): **7/11/2022** (2) at (time): **12:00 PM**
 - b. ☐ **by substituted service.** On (date): at (time): I left the documents listed in item 2 with or in the presence of (name and title or relationship to person indicated in item 3b):
 - (1) ☐ **(business)** a person at least 18 years of age apparently in charge at the office or usual place of business of the person to be served. I informed him or her of the general nature of the papers.
 - (2) ☐ **(home)** a competent member of the household (at least 18 years of age) at the dwelling house or usual place of abode of the party. I informed him or her of the general nature of the papers.
 - (3) ☐ **(physical address unknown)** a person at least 18 years of age apparently in charge at the usual mailing address of the person to be served, other than a United States Postal Service post office box. I informed him or her of the general nature of the papers.
 - (4) ☐ I thereafter mailed (by first-class, postage prepaid) copies of the documents to the person to be served at the place where the copies were left (Code Civ. Proc., §415.20). I mailed the documents on (date): from (city): or ☐ a declaration of mailing is attached.
 - (5) ☐ I attach a **declaration of diligence** stating actions taken first to attempt personal service.

2476 Overland Avenue, Third Floor

Los Angeles, CA 90064

Phone: (310) 858-9800 Fax: (888) 543-5126

Continued from Proof of Service

CLIENT: Rafii & Associates

CLIENT FILE #:

DATE: July 13, 2022

SUBJECT: Target Corporation, a Minneapolis corporation

Civil Case Cover Sheet Addendum and Statement of Location; Notice of Case Assignment - Unlimited Civil Case; Plaintiff's Notice of Deposit of Jury Fees; Certificate of Mailing; First Amended Standing Order RE: Personal Injury Procedures at the Spring Street Courthouse; Third Amended Standing Order RE Final Status Conferences, Personal Injury ("PI") Courts (Effective January 13, 2020); Fifth Amended Standing Order RE: Mandatory Settlement Conference (Effective February 24, 2020); Standing Order RE: Personal Injury Procedures, Central District; Voluntary Efficient Litigation Stipulations; Voluntary Efficient Litigation Stipulations



PETITIONER: Elvia Hernandez Castillo, an individual,

CASE NUMBER:

21STCV08896

RESPONDENT: Target Corporation, a Minneapolis corporation; Genevieve Doe; an individual; and Does 1 through 50, inclusive,

- c. ☐ **by mail and acknowledgment of receipt of service.** I mailed the documents listed in item 2 to the party, to the address shown in item 4, by first-class mail, postage prepaid,
- (1) on (date): (2) from (city):
- (3) ☐ with two copies of the *Notice and Acknowledgment of Receipt* and a postage-paid return envelope addressed to me. (Attach completed Notice and Acknowledgement of Receipt.) (Code Civ. Proc., § 415.30.)
- (4) ☐ to an address outside California with return receipt requested. (Code Civ. Proc., § 415.40.)
- d. ☐ **by other means** (specify means of service and authorizing code section):

☐ Additional page describing service is attached.

6. The "Notice to the Person Served" (on the summons) was completed as follows:

- a. ☐ as an individual defendant.
- b. ☐ as the person sued under the fictitious name of (specify):
- c. ☐ as occupant.
- d. ☒ On behalf of (specify): **Target Corporation, a Minneapolis corporation**
under the following Code of Civil Procedure section:

- | | |
|---|---|
| <input checked="" type="checkbox"/> 416.10 (corporation) | <input type="checkbox"/> 415.95 (business organization, form unknown) |
| <input type="checkbox"/> 416.20 (defunct corporation) | <input type="checkbox"/> 416.60 (minor) |
| <input type="checkbox"/> 416.30 (joint stock company/association) | <input type="checkbox"/> 416.70 (ward or conservatee) |
| <input type="checkbox"/> 416.40 (association or partnership) | <input type="checkbox"/> 416.90 (authorized person) |
| <input type="checkbox"/> 416.50 (public entity) | <input type="checkbox"/> 415.46 (occupant) |
| | <input type="checkbox"/> other: |

7. Person who served papers

- a. Name: **Steven Phillips - ON-CALL LEGAL**
- b. Address: **2476 Overland Avenue, Third Floor Los Angeles, CA 90064**
- c. Telephone number: **(310) 858-9800**
- d. The fee for service was: **\$ 118.43**
- e. I am:

- (1) ☐ not a registered California process server.
- (2) ☒ exempt from registration under Business and Professions Code section 22350(b).
- (3) ☒ registered California process server:
- (i) ☐ owner ☒ employee ☐ independent contractor.
- (ii) Registration No.: **2018048510**
- (iii) County: **Los Angeles**



8. ☒ **I declare** under penalty of perjury under the laws of the State of California that the foregoing is true and correct.
- or
9. ☐ **I am a California sheriff or marshal and** I certify that the foregoing is true and correct.

Date: **7/13/2022**

ON-CALL LEGAL
2476 Overland Avenue, Third Floor
Los Angeles, CA 90064
(310) 858-9800
www.OnCallLegal.com



Steven Phillips

(NAME OF PERSON WHO SERVED PAPERS/SHERIFF OR MARSHAL)

POS-010

ATTORNEY OR PARTY WITHOUT ATTORNEY (Name, State Bar number, and address) Justin Rabi (SBN 305287) Jack Jambazian (SBN 327437) Quinton Sales (SBN 344308) RAFII & ASSOCIATES, P.C. 9100 Wilshire Blvd., Suite 465E, Beverly Hills, CA 90212 TELEPHONE NO.: (310) 777-7877 FAX NO. (310) 777-7855 E-MAIL ADDRESS justin@rafiilaw.com; jack@rafiilaw.com; quinton@rafiilaw.com ATTORNEY FOR (Name): Plaintiff: Elvia Hernandez Castillo, an individual,	FOR COURT USE ONLY
Los Angeles County Superior Court - LOS ANGELES STREET ADDRESS: 312 North Spring Street MAILING ADDRESS: 312 North Spring Street CITY AND ZIP CODE: Los Angeles, CA 90012 BRANCH NAME: Spring Street Courthouse	
PLAINTIFF: Elvia Hernandez Castillo, an individual, DEFENDANT: Target Corporation, a Minneapolis corporation; Genevieve Doe; an individual; and Does 1 through 50, inclusive,	CASE NUMBER: 21STCV08896
PROOF OF SERVICE OF SUMMONS	Ref. No. or File No.:

1. At the time of service I was at least 18 years of age and not a party to this action.
2. I served copies of:
 - a. ☒ Summons
 - b. ☒ Complaint
 - c. ☒ Alternative Dispute Resolution (ADR) package
 - d. ☒ Civil Case Cover Sheet
 - e. ☐ Cross-complaint
 - f. ☒ other (specify documents): See attached Document List
3. a. Party served (specify name of party as shown on documents served):
Target Corporation, a Minneapolis corporation
- b. ☒ Person (other than the party in item 3a) served on behalf of an entity or as an authorized agent (and not a person under item 5b on whom substituted service was made) (specify name and relationship to the party named in item 3a):
C T Corporation System, c/o John Montijo - Registered Agent for Service of Process
Age: 20 Weight: 145 Hair: Brown Sex: Male Height: Eyes: Brown Race: White
4. Address where the party was served: C T Corporation System
330 N Brand Blvd Ste 700
Glendale, CA 91203-2336
5. I served the party (check proper box)
 - a. ☒ by personal service. I personally delivered the documents listed in item 2 to the party or person authorized to receive service of process for the party (1) on (date): 7/11/2022 (2) at (time): 12:00 PM
 - b. ☐ by substituted service. On (date): at (time): I left the documents listed in item 2 with or in the presence of (name and title or relationship to person indicated in item 3b):
 - (1) ☐ (business) a person at least 18 years of age apparently in charge at the office or usual place of business of the person to be served. I informed him or her of the general nature of the papers.
 - (2) ☐ (home) a competent member of the household (at least 18 years of age) at the dwelling house or usual place of abode of the party. I informed him or her of the general nature of the papers.
 - (3) ☐ (physical address unknown) a person at least 18 years of age apparently in charge at the usual mailing address of the person to be served, other than a United States Postal Service post office box. I informed him or her of the general nature of the papers.
 - (4) ☐ I thereafter mailed (by first-class, postage prepaid) copies of the documents to the person to be served at the place where the copies were left (Code Civ. Proc., §415.20). I mailed the documents on (date): from (city): or ☐ a declaration of mailing is attached.
 - (5) ☐ I attach a declaration of diligence stating actions taken first to attempt personal service.

ON-CALL LEGAL

2476 Overland Avenue, Third Floor

Los Angeles, CA 90064

Phone: (310) 858-9800 Fax: (888) 543-5126

Continued from Proof of Service

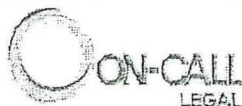
CLIENT: Rafii & Associates

CLIENT FILE #:

DATE: July 13, 2022

SUBJECT: Target Corporation, a Minneapolis corporation

Civil Case Cover Sheet Addendum and Statement of Location; Notice of Case Assignment - Unlimited Civil Case; Plaintiff's Notice of Deposit of Jury Fees; Certificate of Mailing; First Amended Standing Order RE: Personal Injury Procedures at the Spring Street Courthouse; Third Amended Standing Order RE Final Status Conferences, Personal Injury ("PI") Courts (Effective January 13, 2020); Fifth Amended Standing Order RE: Mandatory Settlement Conference (Effective February 24, 2020); Standing Order RE: Personal Injury Procedures, Central District; Voluntary Efficient Litigation Stipulations; Voluntary Efficient Litigation Stipulations



PETITIONER: Elvia Hernandez Castillo, an individual,	CASE NUMBER:
RESPONDENT: Target Corporation, a Minneapolis corporation; Genevieve Doe; an individual; and Does 1 through 50, inclusive,	21STCV08896

- c. ☐ by mail and acknowledgment of receipt of service. I mailed the documents listed in item 2 to the party, to the address shown in item 4, by first-class mail, postage prepaid,
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- (4) ☐ to an address outside California with return receipt requested. (Code Civ. Proc., § 415.40.)
- d. ☐ by other means (specify means of service and authorizing code section):

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under the following Code of Civil Procedure section:

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| <input type="checkbox"/> 416.20 (defunct corporation) | <input type="checkbox"/> 416.60 (minor) |
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| <input type="checkbox"/> 416.40 (association or partnership) | <input type="checkbox"/> 416.90 (authorized person) |
| <input type="checkbox"/> 416.50 (public entity) | <input type="checkbox"/> 415.46 (occupant) |
| | <input type="checkbox"/> other: |

7. Person who served papers

- a. Name: **Steven Phillips - ON-CALL LEGAL**
- b. Address: **2476 Overland Avenue, Third Floor Los Angeles, CA 90064**
- c. Telephone number: **(310) 858-9800**
- d. The fee for service was: \$ **118.43**
- e. I am:

- (1) ☐ not a registered California process server.
- (2) ☐ exempt from registration under Business and Professions Code section 22350(b).
- (3) ☒ registered California process server:
- (i) ☐ owner ☒ employee ☐ independent contractor.
- (ii) Registration No.: **2018048510**
- (iii) County: **Los Angeles**



8. ☒ I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct.
- or
9. ☐ I am a California sheriff or marshal and I certify that the foregoing is true and correct.

Date: 7/13/2022

ON-CALL LEGAL
2476 Overland Avenue, Third Floor
Los Angeles, CA 90064
(310) 858-9800
www.OnCallLegal.com

Steven Phillips

(NAME OF PERSON WHO SERVED PAPERS/SHERIFF OR MARSHAL)



RAFII & ASSOCIATES, P.C.
JUSTIN RABI, SBN 305287
justin@rafiilaw.com
JACK JAMBAZIAN, SBN 327437
jack@rafiilaw.com
QUINTON SALES, SBN 344308
quinton@rafiilaw.com
9100 Wilshire Boulevard, Suite 465E
Beverly Hills, California 90212
Telephone: 310.777.7877
Facsimile: 310.777.7855

Attorneys for Plaintiffs,
ELVIA HERNANDEZ CASTILLO

SUPERIOR COURT OF THE STATE OF CALIFORNIA
COUNTY OF LOS ANGELES

ELVIA HERNANDEZ CASTILLO, an
individual,

Plaintiff,

v.

TARGET CORPORATION, a Minneapolis
corporation; GENEVIEVE DOE; an
individual; and DOES 1 through 50, inclusive,
Defendants.

Case No. 21STCV08896

Complaint Filed: March 5, 2021

Assigned for All Purposes to:
Judge: Hon. Edward B. Moreton
Dept.: 12

**PLAINTIFFS' NOTICE OF DEPOSIT OF
JURY FEES**

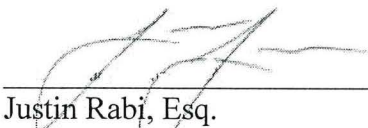
TO ALL INTERESTED PARTIES AND THEIR ATTORNEYS OF RECORD:
PLEASE TAKE NOTICE THAT: Plaintiff, ELVIA HERNANDEZ CASTILLO,
hereby deposits jury fees in the amount of \$150.00 pursuant California *Code of Civil Procedure*
§631.

DATED: July 14, 2022

Respectfully submitted,

RAFII & ASSOCIATES, P.C.

By:


Justin Rabi, Esq.
Jack Jambazian, Esq.
Quinton Sales, Esq.
Attorneys for Plaintiffs,
ELVIA HERNANDEZ CASTILLO